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January 5, 2023

VIA ECF

Hon. Renée Marie Bumb, U.S.D.J.
United States District Court
4th & Cooper Streets
Camden, New Jersey 08101

**Re: *Mazahreh, et al. v. Grewal, et al.*
Civil Action No. 1:20-cv-17598-RMB-MJS
Joint Request to Amend 10/12/22 Consent Order (Dkt. 51),
to Extend by 30 Days Plaintiffs' Deadline to Apply for
Award of Counsel Fees and Costs**

Dear Judge Bumb:

I am an attorney for the State Defendants in the above-referenced matter. As the Court is aware, following the Supreme Court's decision in *New York State Rifle & Pistol Association, Inc. v. Bruen*, 142 S. Ct. 2111 (2022), the parties in this matter collaborated and agreed on a proposed Consent Order for Entry of Final Judgment, enjoining the enforcement of the "justifiable need" provision of N.J. Stat. Ann. § 2C:58-4(c) and N.J. Admin. Code § 13:54-2.4, which the Court entered on October 12, 2022. Dkt. 51. In pertinent part, the Consent Order provides that "Plaintiffs may apply for an award of counsel fees and costs at any time within 90 days of the date of the entry of this judgment." *Id.* ¶ 6. As such, the current deadline for Plaintiffs to do so would be January 10, 2023.

The parties now jointly request that the Court amend the Order to permit a further 30-day extension of time for Plaintiffs to apply for such an award, making the new deadline February 9, 2023. The reason for this is that, while the parties are interested in reaching a favorable resolution of fees/costs, and to



January 5, 2023

Page 2

hopefully avoid the need for a court application, some of the defendants require additional time to obtain formal authority from their governing bodies to engage in settlement negotiation. Our understanding is that extending the deadline by 30 days will permit sufficient time for this to occur. For this reason, and because all defendants and the plaintiffs join in this request, it is respectfully submitted that good cause exists to grant it.

Thank you for the Court's consideration of this matter.

Respectfully submitted,

MATTHEW J. PLATKIN
ATTORNEY GENERAL OF NEW JERSEY

By: /s/ Daniel M. Vannella
Daniel M. Vannella
Assistant Attorney General

cc: All counsel of record (via ECF)